February 13, 2020

Julianne Polanco State Historic Preservation Officer Office of Historic Preservation Department of Parks & Recreation 1725 23<sup>rd</sup> Street, Suite 100 Sacramento, CA 85816

Mark A. Beason State Historian II Office of Historic Preservation Department of Parks & Recreation 1725 23rd Street, Suite 100 Sacramento, CA 95816

Subject: Initiation of Section 106 consultation for the USGS Radio Upgrade Project, NASA Ames Research Center Moffett Federal Airfield, Santa Clara County, CA.

Dear Ms. Polanco,

The United States Geological Survey (USGS) proposes to construct a communications facility within Lot 127C at the National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) at Moffett Federal Airfield (MFA) in Santa Clara County, California. Per the requirements of the National Historic Preservation Act (NHPA), as amended, and its regulations found at 36 CFR Part 800, NASA, as the lead federal agency, has determined that the USGS Radio Upgrade Project constitutes an Undertaking. The purpose of this letter is to request the initiation of Section 106 consultation pursuant to §800.3(c)(3), to request State Historic Preservation Officer (SHPO) concurrence on NASA's delineation of the proposed Area of Potential Effects (APE) as defined in §800.16(d) for the proposed USGS Radio Upgrade Project (hereafter referred to as the Undertaking), and to request SHPO concurrence on NASA's determination of No Adverse Effect on historic properties as a result of the proposed Undertaking.

The proposed Undertaking involves placement of a permanent communications facility consisting of a 70-foot, four-legged self-supporting tower and a 12-foot by 26-foot prefabricated communications shelter within a fenced 3,600 square foot (60 feet by 60 feet) area in Lot 127C. The 70-foot tower will have instrumentation attached on the sides between approximately 50 and 70 feet above the ground surface with space for additional equipment down to 25 feet above ground surface. A Lightweight Surveillance Target Acquisition Radar (LSTAR) antenna, lightning rod, and tower beacon strobe light will be placed at the top of the tower. With all instrumentation attached, the total height of the structure will be 80 feet above ground surface. The Undertaking will include above-grade work as well as ground disturbance for installation of the communications tower.

NASA has determined that the Undertaking's horizontal APE for above-ground cultural resources consists of areas where direct and indirect impacts to cultural resources could occur as a result of

project activities. The proposed Undertaking location, Lot 127C, is on the north side of Pollack Road, and is currently occupied by asphalt and gravel parking areas and a maintenance facility building shed constructed in 1999. The APE includes the Area of Direct Impact (ADI), the project site and footprint where direct effects to above and below ground historic properties could occur. The ADI for the proposed undertaking is limited to the 60-foot by 60-foot (.08 acre) portion of Lot 127C within which installation will occur. Proposed vertical impacts vary within the ADI between surface grading across most of the area and drilling to approximately 22 feet below ground surface (BGS) at eight locations for tower and platform foundations. The APE also includes areas within which the integrity of historic properties' setting, if and where historic properties exist, could be affected indirectly through visual, atmospheric, or audible changes. For the current Undertaking, the APE boundary is defined by a radius of 1,000 feet from the center of the ADI, encompassing approximately 72 acres. The limited scale of the Undertaking is not likely to result in any indirect effects beyond this distance.

Pursuant to the implementing regulations of the NHPA found at 36 CFR 800.4(a) (1), NASA seeks your concurrence with its delineation of the APE for both archaeological and historic architectural resources.

The enclosed Section 106 Technical Report, dated January 15, 2020, identifies NASA as the lead agency, describes the Undertaking, delineates the Area of Potential Effect (APE), and lists the identified historic properties within the APE. The report provides an assessment of the proposed Undertaking under the Criteria of Adverse Effects and supports a finding of No Adverse Effect for the proposed Undertaking.

NASA requests the SHPO's concurrence with its delineation of the APE and finding of No Adverse Effect on historic properties for the proposed Undertaking within 30 days of receipt of this letter, as specified in 36 CFR 800.3(c).

Please feel free to contact me at Jonathan.D.Ikan@nasa.gov or (650) 604-6859 if you have any questions regarding this matter.

Sincerely,

Jonathan D. Ikan

Cultural Resources Manager NASA Ames Research Center Historic Preservation Office, MS 213-8 Moffett Field, California 94035-0001 (650) 604-6859 Jonathan.D.Ikan@nasa.gov

Cc:

Ms. Rebecca Klein, NASA Deputy FPO Environmental Management Division NASA Headquarters 300 E Street, SW Washington, DC 20546-0001

Enclosure: Section 106 Technical Report: USGS FEMA South Site Communications Facility, by Page & Turnbull, January 15, 2020.